

BARRY D. ROSS
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CHARLOTTE, NC 28262
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Pro Se Plaintiff BARRY ROSS

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

BARRY ROSS, an Individual;
Plaintiff,

v.

WALMART LABS, a California
Corporation; WALMART, INC., an
Arkansas Corporation; RANDSTAD
STAFFING, a California Corporation;
RANDSTAD NORTH AMERICA, INC.,
a Georgia Corporation; RANDSTAD
SOURCERIGHT, a Georgia Corporation;
JASON CORBETT, an Individual;
ASHLEY HOGAN, an Individual; and
DOES 1 through 25, Inclusive,
Defendants.

CASE NO: 3:21-CV-01945-SI

**PLAINTIFF'S DECLARATION
PURSUANT TO MOTION TO COMPEL
ORDER**

Plaintiff Ross in compliance with Judge Illston's directive, has read and reviewed (1) Federal Rules of Civil Procedure 26, 30, and 33-37; (2) Northern District Civil Local Rules 26, 30, and 33-37, and (2) General Order 71 re: Discovery Protocols for Employment Cases Alleging Adverse Action.

1 Plaintiff sought to compel discovery, based upon Defendants' failure to provide requested
2 documents, as part of their initial discovery submissions. Plaintiff notified Defendants, that he
3 was planning to file a Request for Documents, prior to Defendants' submission of initial
4 discovery. However, Defendant Counsel, Kiran Lopez, indicated on September 7th, 2021 that
5 Defendants would provide requested documents, based upon Plaintiff's request via email.
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7 When Defendants failed to provide requested documents, Plaintiff filed his Motion to
8 Compel. Furthermore, at the time of Plaintiff's filing, Defendants had not proffered a protective
9 order, to comply with request. Defendants only replied to Plaintiff's request, upon filing of a
10 Motion to Compel.

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12 Dated : November 1, 2021
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14 *BARRY D. ROSS*

15 BARRY D. ROSS,
16 PRO SE PLAINTIFF
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